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REMARKS

Claims 1-2, 6-14 and 20-28 are all the claims presently pending in the application. Claims 6 and 7 have been amended to more particularly define the invention. Claims 4-5 and 15-19 have been previously withdrawn pursuant to a restriction requirement and are canceled without prejudice or disclaimer. Claims 20-28 have been added to assure Applicants the degree of protection to which the invention entitles them.

It is noted that the claim amendments herein or later are <u>not</u> made to distinguish the invention over the prior art or narrow the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein or later should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

With respect to the prior art rejections, claims 1 and 9 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Hanes, et al. (U.S. Patent No. 6,466,952) (hereinafter "Hanes"). Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hanes in view of Sanada, et al. (U.S. Patent No. 6,484,245) (hereinafter "Sanada"). Claims 6-7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hanes in view of Cecchini, et al. (U.S. Patent No. 6,292,794) (hereinafter "Cecchini"). Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hanes in view of Colby, et al. (U.S. Patent No. 6,480,836) (hereinafter "Colby"). Claim 10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hanes in view of Vora, et al. (U.S. Patent No. 5,819,273) (hereinafter "Vora"). Claims 11-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hanes in view of Sanada and further in view of Dekoning (U.S. Patent No.

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6,671,776). Claims 13-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable

over Hanes in view of Sanada and Lee, et al. (U.S. Patent No. 6,061,696) (hereinafter "Lee").

The rejections are respectfully traversed in the following discussion.

I. THE CLAIMED INVENTION

The claimed invention is directed to a database system, a database server, and a

method of controlling the operation of a database server.

In one exemplary aspect, as recited in claim 1, the database system includes a database

in which data has been stored accessibly, a search device for accessing the database in

accordance with an applied search command and searching data that has been stored in the

database, a command execution device, to which a command is entered, for applying a search

command to the search device in accordance with this entered command, and a first interface

for separably and directly connecting, without via a network, the search device and the

command execution device. The search device is replaceable by another search device upon

separation of the search device from the first interface, and upon replacement of the search

device by the other search device, the first interface separably and directly connects, without

via a network, the other search device and the command execution device. Independent claim

28 contains similar language.

Another aspect of the invention, as recited in claim 20, is directed to a database

system including a database in which data has been stored accessibly, a search device for

accessing the database in accordance with an applied search command and searching data that

has been stored in the database, a command execution device, to which a command is

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entered, for applying a search command to the search device in accordance with this entered

command, a first interface for separably and directly connecting, without via a network, the

search device and the command execution device; a storage device for storing data readably, a

storage controller for accessing the storage device and reading data that has been stored in the

storage device or writing data to the storage device in accordance with an applied read/write

command; and a second interface for separably connecting the storage controller and the

command execution device. The command execution device applies a read/write command

to the storage controller in accordance with the entered command. The search device is

replaceable by another search device upon separation of the search device from the first

interface, and upon replacement of the search device by the other search device, the first

interface separably and directly connects, without via a network, the other search device and

the command execution device.

Such features are not taught or suggested by the cited references.

II. THE 35 USC §112, SECOND PARAGRAPH REJECTION

Claim 6 stands rejected under 35 U.S.C. §112, second paragraph. The claim has been

amended, above, to correct the informalities cited by the Examiner. Specifically, claim 6 has

been amended to recite a "command execution device" for proper antecedent basis.

In view of the foregoing, the Examiner is respectfully requested to reconsider and

withdraw this rejection.

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III. THE PRIOR ART REFERENCES

A. The Hanes Reference

The Examiner alleges that Hanes teaches the inventions of claims 1 and 9. However,

Applicants respectfully submit that Hanes does not teach or suggest each and every element

of the invention as claimed.

Hanes discloses a computer-based method and apparatus transfer files from a source

media to a destination media. (See Hanes at Abstract)

However, Hanes does not teach or suggest that the "search device is replaceable by

another search device upon separation of [the] search device from [the] first interface, and

upon replacement of [the] search device by [the] other search device, [the] first interface

separably and directly connects, without via a network, [the] other search device and [the]

command execution device," as recited in independent claim 1. Independent claims 20 and 28

contain similar language.

In fact, the Examiner concedes in item 8, page 6 of the Office Action that Hanes does

not teach or suggest such features.

Clearly, there are elements of the claimed invention that are <u>not</u> taught or suggested by

Hanes. Therefore, the Examiner is respectfully requested to withdraw this rejection.

B. The Sanada Reference

The Examiner alleges that Hanes would have been combined with Sanada to form the

invention of claim 2. However, Applicants submit that these references would not

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have been combined and even if combined, the combination would <u>not</u> teach or suggest each

and every element of the claimed invention.

Sanada discloses an apparatus for and method of accessing a storage region across a

network. The disclosure relates to storage control apparatus with ANSIX3T11-

standardization fiber channels as an interface with its upper-level or "host" computers, and

more particularly to a storage controller device which is employable in a computer system for

elimination of unauthorized access attempts upon issuance of a request to access the storage

as sent from a host computer to the storage controller. (Sanada at column 1, lines 1-15)

Applicants respectfully submit that these references would not have been combined as

alleged by the Examiner. Indeed, these references are completely unrelated, and no person of

ordinary skill in the art would have considered combining these disparate references, absent

impermissible hindsight.

In fact, Applicants submit that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the

Examiner's allegations, neither of these references teaches or suggests their combination.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would

not have been so motivated to combine the references as alleged by the Examiner. Therefore,

the Examiner has failed to make a prima facie case of obviousness.

Moreover, neither Hanes, nor Sanada, nor any combination thereof, teaches or

suggests "a second interface for separably connecting [the] storage controller and [the]

command execution device," as recited in claim 2. Independent claim 20 contains similar

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language. The Examiner concedes that Hanes does not teach this feature. Rather, the Examiner attempts to rely on Sanada to make up for the deficiencies of Hanes

The invention, as recited in claim 2, includes a second interface for separably connecting the storage controller and the command execution device. In this manner, the storage controller and the command execution device can be readily separated and a different storage controller can be connected to the command execution device. (Application at page 4, lines 21-28 and page 5, line 1)

Sanada, on the other hand, discloses that "[t]he host computers 10,20,30 and storage controller 40 employ a fiber channel 60 as the interface, and are connected together via a device known as the 'fabric.'" (See Sanada at column 5, lines 35-37) However, nowhere does Sanada teach or suggest that the fiber channel 60 interface separably connects the storage controller and the host computers 10,20,30, as in claim 2.

Rather, Sanada merely discloses that the fabric may have technical advantages, such as high data transfer speed and capability for a multi-layered logical bus configuration. (See Sanada at column 6, lines 14-31) Indeed, Sanada makes no reference or suggestion that the interface <u>separably</u> connects the host computers and storage controller.

Thus, even assuming arguendo that Sanada may disclose an interface, as alleged by the Examiner, there is no teaching or suggestion in Sanada that the host computers 10,20,30 and storage controller 40 are separably connected by the interface to permit the substitution of a different storage controller, as in claim 2. Indeed, the cited reference does not even recognize the desirability or benefit of providing such a feature. Therefore, Sanada clearly does not make up for the deficiencies of Hanes.

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Additionally, neither Hanes, nor Sanada, teach or suggest a system including two interfaces (i.e. a first interface and a second interface), as recited in claim 2. As noted above, the Examiner concedes that Hanes does <u>not</u> teach or suggest a second interface. However, Sanada also fails to teach or suggest a second interface of any sort beyond the disclosed fiber channel fabric 60 cited by the Examiner. Clearly, neither Hanes, nor Sanada, nor any combination thereof teach or suggest a database system including a first interface and a second interface, as in claim 2.

Further, Sanada fails to make up for the deficiencies of Hanes described above in that the "search device is replaceable by another search device upon separation of [the] search device from [the] first interface, and upon replacement of [the] search device by [the] other search device, [the] first interface separably and directly connects, without via a network, [the] other search device and [the] command execution device," as recited in claim 2.

Again, even assuming arguendo that Sanada may disclose an interface, as alleged by the Examiner, there is no teaching or suggestion in Sanada of a search device being replaceable by another search device such that the first interface separably and directly connects, without via a network, the other search device and the command execution device, as in claim 2, so that a different search device, employing a desired search technique, can be readily connected to the command execution device. Sanada reference does <u>not</u> even recognize the desirability or benefit of providing such a feature. Therefore, Sanada clearly does not make up for the deficiencies of Hanes.

In light of the above, Applicants submit that these references would not have been combined and even if combined, the combination would not teach or suggest each and every

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element of claim 2. Therefore, the Examiner is respectfully requested to withdraw this

rejection.

C. The Cecchini Reference

The Examiner alleges that Hanes would have been combined with Cecchini to form

the invention of claims 6-7. However, Applicants submit that these references would <u>not</u>

have been combined and even if combined, the combination would not teach or suggest each

and every element of the claimed invention.

Cecchini discloses a technique for incorporating text retrieval into the logic associated

with current stem search technologies. (Cecchini at Abstract)

Applicants respectfully submit that these references would not have been combined as

alleged by the Examiner. Indeed, these references are completely unrelated, and no person of

ordinary skill in the art would have considered combining these disparate references, absent

impermissible hindsight.

In fact, Applicants submit that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the

Examiner's allegations, neither of these references teaches or suggests their combination.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would

not have been so motivated to combine the references as alleged by the Examiner. Therefore,

the Examiner has failed to make a prima facie case of obviousness.

As noted above, the Examiner concedes that Hanes does not teach or suggest that the

"search device is replaceable by another search device upon separation of [the] search

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device from [the] first interface, and upon replacement of [the] search device by [the] other search device, [the] first interface separably and directly connects, without via a network, [the] other search device and [the] command execution device," as recited in the claimed invention. Rather the Examiner attempts to rely on Cecchini to make up for the deficiencies of Hanes.

The Examiner alleges that Cecchini teaches that a conventional stem search engine is replaced by the smart Stem Search technique. However, Cecchini discloses "a software system which integrates a stem search engine 1 ... and a database search engine 2." (See Cecchini at Figure 1 and column 4, lines 64-67) (Emphasis added) In this manner, Cecchini provides a cascading search engine structure in which if the desired results are not achieved by the stem search engine 1, a gate is triggered to pass a copy of the original user entered stem search to the database search engine 2. (See Cecchini at column 5, lines 22-32)

Thus, in Cecchini, the database search engine 2 does <u>not</u> replace the stem search engine 1. Rather, the original query is merely forwarded to the database engine 2 from the stem search engine 1. At no point is the stem search engine 1 separated from an interface in Cecchini. Indeed, Cecchini makes <u>no</u> reference or suggestion to the stem search engine 1 being replaceable by the database search engine 2 upon separation of the stem search engine 1 from an interface of any sort. Cecchini certainly does not teach or suggest that upon replacement of the stem search engine 1 by the database search engine 2, the interface separably and directly connects the database search engine 2 and a command execution unit.

The claimed invention, on the other hand, includes a first interface for separably and directly, without via a network, connecting the search device and the command execution

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device. Since the first interface directly connects, without via a network, the search device

and the command execution device in such a manner that the two can be separated from each

other, the search device connected to the command execution device is replaceable by a

different search device, which may employ a desired search technique and is connected to the

command execution device by the first interface. (See Application at page 3, lines 26-28 and

page 4, lines 1-8) Cecchini does <u>not</u> even recognize the desirability or benefit of providing

such a feature. Therefore, Cecchini clearly does <u>not</u> make up for the deficiencies of Hanes.

Clearly, there are elements of the claimed invention that are not taught or suggested by

Hanes, or Cecchini, or any combination thereof.

In light of the above, Applicant submits that Hanes and Cecchini would <u>not</u> have

been combined and even if combined, the combination would not teach or suggest each and

every element of the invention of the claimed invention. Therefore, the Examiner is

respectfully requested to withdraw this rejection.

D. The Colby Reference

The Examiner alleges that Hanes would have been combined with Colby to form the

invention of claim 8. However, Applicants submit that these references would <u>not</u> have been

combined and even if combined, the combination would <u>not</u> teach or suggest each and every

element of the claimed invention.

Colby discloses methods and apparatus for processing precomputed views for

answering user queries on a database. (Colby at Abstract)

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Applicants respectfully submit that these references would not have been combined as

alleged by the Examiner. Indeed, these references are completely <u>unrelated</u>, and no person of

ordinary skill in the art would have considered combining these disparate references, absent

impermissible hindsight.

In fact, Applicants submit that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the

Examiner's allegations, neither of these references teaches or suggests their combination.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would

not have been so motivated to combine the references as alleged by the Examiner. Therefore,

the Examiner has failed to make a prima facie case of obviousness.

The Examiner concedes that Hanes does not teach or suggest "a relational database

management system containing attribute information corresponding to [the] data, wherein

[the] relational database management system is searchable by [the] search device," as recited

in claim 8. Claim 22 contains similar language. Rather, the Examiner attempts to rely on

Colby to make up for the deficiencies of Hanes.

However, Colby fails to make up for the deficiencies of Hanes described above in that

the "search device is replaceable by another search device upon separation of [the] search

device from [the] first interface, and upon replacement of [the] search device by [the] other

search device, [the] first interface separably and directly connects, without via a network,

[the] other search device and [the] command execution device," as recited in the claimed

invention. Indeed, neither Hanes, nor Colby, nor any combination thereof, teaches or

suggests this feature.

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Thus, even assuming <u>arguendo</u> that Colby may disclose a relational database

management system containing attribute information corresponding to data that is searchable

by the search device, as alleged by the Examiner, there is no teaching or suggestion in Colby

of a search device being replaceable by another search device such that the first interface

separably and directly connects, without via a network, the other search device and the

command execution device, as in the claim 8, so that a <u>different search device</u>, employing a

desired search technique, can be readily connected to the command execution device. The

cited reference does <u>not</u> even recognize the desirability or benefit of providing such a feature.

Therefore, Colby clearly does not make up for the deficiencies of Hanes.

In light of the above, Applicants submit that Hanes and Colby would not have been

combined and even if combined, the combination would <u>not</u> teach or suggest each and every

element of claim 8. Therefore, the Examiner is respectfully requested to withdraw this

rejection.

E. The Vora Reference

The Examiner alleges that Hanes would have been combined with Vora to form the

invention of claim 10. However, Applicants submit that these references would <u>not</u> have

been combined and even if combined, the combination would not teach or suggest each and

every element of the claimed invention.

Vora discloses a method and apparatus for maintaining information in a network of

computer systems and for controlling the display of searchable information. (Vora at

Abstract)

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Applicants respectfully submit that these references would not have been combined as

alleged by the Examiner. Indeed, these references are completely unrelated, and no person of

ordinary skill in the art would have considered combining these disparate references, absent

impermissible hindsight.

In fact, Applicants submit that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the

Examiner's allegations, neither of these references teaches or suggests their combination.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would

not have been so motivated to combine the references as alleged by the Examiner. Therefore,

the Examiner has failed to make a prima facie case of obviousness.

The Examiner concedes that Hanes does <u>not</u> teach or suggest "a command resending

device for transmitting the entered command to another database server," as recited in claim

10. Claim 24 contains similar language. Rather, the Examiner attempts to rely on Vora to

make up for the deficiencies of Hanes.

However, Vora fails to make up for the deficiencies of Hanes described above in that

the "search device is replaceable by another search device upon separation of [the] search

device from [the] first interface, and upon replacement of [the] search device by [the] other

search device, [the] first interface separably and directly connects, without via a network,

[the] other search device and [the] command execution device," as recited in the claimed

invention. Indeed, neither Hanes, nor Vora, nor any combination thereof, teaches or suggests

this feature.

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Thus, even assuming arguendo that Vora may disclose that the user search request may be transferred to another database server, as alleged by the Examiner, there is no teaching or suggestion in Vora of a search device being replaceable by another search device such that the first interface separably and directly connects, without via a network, the other search device and the command execution device, as in the claimed invention, so that a different search device, employing a desired search technique, can be readily connected to the command execution device. The cited reference does not even recognize the desirability or benefit of providing such a feature. Therefore, Vora clearly does not make up for the deficiencies of Hanes.

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In light of the above, Applicant submits that Hanes and Vora would <u>not</u> have been combined and even if combined, the combination would <u>not</u> teach or suggest each and every element of claim 10. Therefore, the Examiner is respectfully requested to withdraw this rejection.

F. The Dekoning Reference

The Examiner alleges that Hanes would have been combined with Sanada and Dekoning to form the invention of claims 11-12. However, Applicant submits that these references would <u>not</u> have been combined and even if combined, the combination would <u>not</u> teach or suggest each and every element of the claimed invention.

Dekoning discloses a system and method for dynamically generating the topology of a storage array network by linking information concerning hosts and clusters along with information about host port adapters. (Dekoning at Abstract)

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Applicants respectfully submit that these references would not have been combined as

alleged by the Examiner. Indeed, these references are completely <u>unrelated</u>, and no person of

ordinary skill in the art would have considered combining these disparate references, absent

impermissible hindsight.

In fact, Applicants submit that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the

Examiner's allegations, neither of these references teaches or suggests their combination.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would

not have been so motivated to combine the references as alleged by the Examiner. Therefore,

the Examiner has failed to make a prima facie case of obviousness.

The Examiner concedes that Hanes and Sanada do not teach or suggest that "[the]

storage controller is replaceable by a second storage controller upon separation from [the]

command execution device," as recited in claims 11 and 12. Claims 25 and 26 contain

similar language. Rather, the Examiner attempts to rely on DeKoning to make up for the

deficiencies of Hanes and Sanada.

However, DeKoning discloses that "[i]n an alternate embodiment, each RAID

controller in the data storage system may be replaced with PCI RAID controllers or other low

end RAID controllers." (See DeKoning at column 4, lines 17-20) As such, DeKoning merely

discloses that different embodiments may contain different controllers. In fact, DeKoning

discloses that the storage controllers 116 are coupled to a host adaptor 104 of the host system

102 by host buses 112. (See DeKoning at Figure 1, column 3, lines 62-65, and column 4,

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lines 13-19) DeKoning makes <u>no</u> mention or suggestion that the RAID controllers may be separably connected to the host adapters or host system.

Clearly, DeKoning does not disclose that the storage controller is separably connected to the command execution device by a second interface such that the storage controller is replaceable upon separation from the command execution device, as in claims 11 and 12.

Further, DeKoning fails to make up for the deficiencies of Hanes and Sanada described above in that the "search device is replaceable by another search device upon separation of [the] search device from [the] first interface, and upon replacement of [the] search device by [the] other search device, [the] first interface separably and directly connects, without via a network, [the] other search device and [the] command execution device," as recited in the claimed invention. Indeed, neither Hanes, nor Sanada, nor DeKoning, nor any combination thereof, teaches or suggests this feature.

Thus, even assuming <u>arguendo</u> that DeKoning may disclose that a storage controller is replaceable by a second storage controller upon separation from the command execution device, as alleged by the Examiner, there is no teaching or suggestion in DeKoning of a search device being replaceable by another search device such that the first interface separably and directly connects, without via a network, the other search device and the command execution device, as in the claimed invention, so that a <u>different search device</u>, employing a desired search technique, can be readily connected to the command execution device. The cited reference does <u>not</u> even recognize the desirability or benefit of providing such a feature. Therefore, DeKoning clearly does not make up for the deficiencies of Hanes and Sanada.

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In light of the above, Applicant submits that Hanes, Sanada and DeKoning would not

have been combined and even if combined, the combination would not teach or suggest each

and every element of claims 11 and 12. Therefore, the Examiner is respectfully requested to

withdraw this rejection.

G. The Lee Reference

The Examiner alleges that Hanes would have been combined with Sanada and Lee to

form the invention of claims 13-14. However, Applicant submits that these references would

not have been combined and even if combined, the combination would not teach or suggest

each and every element of the claimed invention.

Lee discloses a method performed on a computer system for generating multimedia

documents. (Lee at Abstract)

Applicants respectfully submit that these references would not have been combined as

alleged by the Examiner. Indeed, these references are completely unrelated, and no person of

ordinary skill in the art would have considered combining these disparate references, absent

impermissible hindsight.

In fact, Applicants submit that the Examiner can point to no motivation or suggestion

in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the

Examiner's allegations, neither of these references teaches or suggests their combination.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would

not have been so motivated to combine the references as alleged by the Examiner. Therefore,

the Examiner has failed to make a prima facie case of obviousness.

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Regarding claims 13 and 14, the Examiner concedes that neither Hanes, nor Sanada, nor any combination thereof, teaches or suggests "an expression-format converter for generating data having a desired expression format when it is determined that data having the desired expression format is not stored in the database," as recited in claim 13, or that the "expression format converter is separably connected to [the] command execution device by [the] second interface," as recited in claim 14. Rather, the Examiner attempts to rely on Lee to make up for the deficiencies of Hanes and Sanada.

However, Lee discloses that a converted format of an object can be stored as a local file apart from the file containing the native format version. The objects that can be represented in a multimedia document using one format can be manipulated in another format. Lee indicates that many different variations of conversion operations are available, including between different formats of the same media type and between different media types. (See Lee at column 3, lines 1-19)

The Examiner alleges that the above shows that the system in Lee determines that data having the desired format is not stored in the database, as in claims 13 and 14. However, the fact that the system in Lee converts objects between formats and saves the converted version, does not suggest that the system generated that converted file upon determination that the converted file was not stored in the database, as in claims 13 and 14. In fact, Lee does not teach or suggest the system making such a determination.

Further, there is also no teaching or suggestion in Lee that the expression-format converter is <u>separably</u> connected to the command execution unit by the second interface. Rather, Lee merely discloses that the author may determine converting preferences and

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parameters and the various file types to be created. Nowhere does Lee teach or suggest that the converter and command execution unit are separably connected, as in claim 14.

Additionally, Lee fails to make up for the deficiencies of Hanes described above in that the "search device is replaceable by another search device upon separation of [the] search device from [the] first interface, and upon replacement of [the] search device by [the] other search device, [the] first interface separably and directly connects, without via a network, [the] other search device and [the] command execution device," as recited in the claimed invention. Indeed, neither Hanes, nor Sanada, nor Lee, nor any combination thereof, teaches or suggests this feature.

Thus, even assuming arguendo that Lee may disclose an expression-format converter for generating data having a desired expression format when it is determined that data having the desired expression format is not stored in the database, as alleged by the Examiner, there is no teaching or suggestion in Lee of a search device being replaceable by another search device such that the first interface separably and directly connects, without via a network, the other search device and the command execution device, as in the claimed invention, so that a <u>different search device</u>, employing a desired search technique, can be readily connected to the command execution device. The cited reference does <u>not</u> even recognize the desirability or benefit of providing such a feature. Therefore, Lee clearly does not make up for the deficiencies of Hanes and Sanada.

In light of the above, Applicant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every

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element of claims 13 and 14. Therefore, the Examiner is respectfully requested to withdraw

this rejection.

IV. FORMAL MATTERS AND CONCLUSION

The Examiner has objected to claim 1 due to informalities. In particular, the

Examiner objects to the limitation of "a second search device." Applicant respectfully notes

claim 1 does not contain the cited language. Rather, the limitation appeared in claim 6.

Notwithstanding, claim 1, as amended, includes the limitation of "another search device."

Applicant submits that the terms "unit" and "device" have been repeatedly and consistently

used throughout the specification and claims to refer to like elements (i.e. search unit and

search device). As such, the term "device," in this instance, has been used for continuity and

clarity within the claims.

In view of the foregoing, Applicant submits that claims 1-2, 6-14 and 20-28, all the

claims presently pending in the application, are patentably distinct over the prior art of record

and are allowable, and that the application is in condition for allowance. Such action would

be appreciated.

Should the Examiner find the application to be other than in condition for allowance,

the Examiner is requested to contact the undersigned attorney at the local telephone number

listed below to discuss any other changes deemed necessary for allowance in a telephonic or

personal interview.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR

§1.136. The Commissioner is authorized to charge any deficiency in fees, including

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extension of time fees, or to credit any overpayment in fees to Attorney's Deposit Account

No. 50-0481.

Respectfully Submitted,

Date: 17, 2006

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